

UNITED STATES DISTRICT COURT  
DISTRICT OF VERMONT

RÜMEYSA ÖZTÜRK,

*Petitioner,*

v.

DONALD J. TRUMP, in his official capacity as President of the United States; PATRICIA HYDE, in her official capacity as the New England Field Office Director for U.S. Immigration and Customs Enforcement; MICHAEL KROL, in his official capacity as HSI New England Special Agent in Charge, U.S. Immigration and Customs Enforcement; TODD LYONS, in his official capacity as Acting Director, U.S. Immigration and Customs Enforcement; KRISTI NOEM, in her official capacity as Secretary of the United States Department of Homeland Security; and MARCO RUBIO, in his official capacity as Secretary of State,

*Respondent.*

Case No. 25-cv-00374-wks

**AFFIDAVIT OF MICHAEL K.T. TAN IN SUPPORT OF MOTION FOR  
ADMISSION PRO HAC VICE**

I, Michael K.T. Tan, pursuant to 28 U.S.C. § 1746, hereby state as follows:

1. I am an attorney at the American Civil Liberties Union Foundation. My office address is: 125 Broad Street, Floor 18, New York, NY 10004. My office phone number is: (212) 549-2500. My fax number is (332) 221-1702. My office email address is: M.Tan@aclu.org.

2. I am a member in good standing of the bar of the State of New York, bar No. 4654208, having been admitted in April 2009. I am admitted to the following federal courts: the Supreme Court of the United States, the United States Court of Appeals for the First Circuit, the

United States Court of Appeals for the Second Circuit, the United States Court of Appeals for the Third Circuit, the United States Court of Appeals for the Fourth Circuit, the United States Court of Appeals for the Ninth Circuit, the United States Court of Appeals for the Tenth Circuit, the United States Court of Appeals for the Eleventh Circuit, the United States Court of Appeals for the District of Columbia Circuit, the United States District Court for the Eastern District of Michigan, the United States District Court for the Northern District of California, the United States District Court for the Middle District of Georgia, and the United States District Court for the Southern District of New York.

3. I have no pending disciplinary complaints and I have not been denied admission, been disciplined by, resigned from, surrendered my license to practice before, or withdrawn an application for admission to practice before this Court or any other court, while facing a disciplinary complaint or at any other time.

4. The granting of this motion will not require modification of any scheduling order entered pursuant to Fed. R. Civ. P. 16(b); and I have fully reviewed and am familiar with the Federal Rules of Civil and Criminal Procedure, the Local Rules of the United States District Court for the District of Vermont, and the Vermont Rules of Professional Conduct. This motion is accompanied by payment in the amount of \$150.00.

5. I am co-counseling this case on behalf of the Petitioner with attorney Lia Ernst. I acknowledge that this attorney is required to be fully prepared to represent the clients at any time and in any capacity, and to act as the agent for service of process. I acknowledge that the District of Vermont is the forum for the resolution of any dispute arising out of my admission.

I declare under penalty of perjury that the foregoing is true and correct. Executed in New York,  
New York on May 21, 2025.

A handwritten signature in black ink, appearing to read "Michael K.T. Tan", with a stylized flourish at the end.

Michael K.T. Tan  
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Foundation  
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